



CJ14-4712  
Graves

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

AUG 21 2014

TIM RHODES  
COURT CLERK

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STEVEN SCHREINER, and LAURA ROJO,

Plaintiffs,

v.

FARMERS INSURANCE COMPANY, INC., and  
BRIAN HIGGINS,

Defendants.

[CJ]-2014-4712

PETITION

COME NOW the plaintiffs, above-named, and for their cause of action against the defendants, allege and state as follows:

FIRST CAUSE OF ACTION

1. At all times material hereto, Plaintiffs were residents of Yukon, Canadian County, Oklahoma, and purchased an insurance policy from the Defendant, Farmers Insurance Company, Inc., through its agent, and representative, Brian Higgins in Oklahoma City, Oklahoma.

2. Defendants Farmers Insurance is an entity licensed and authorized to conduct insurance business in Oklahoma, and the employer of Defendant Brian Higgins.

3. Defendant Brian Higgins is an employee and an appointed agent of Farmers Insurance Company and is licensed to conduct insurance business in Oklahoma.

4. At all times material hereto, Plaintiffs authorized Brian Higgins to purchase flood insurance policy from Farmers Insurance for their home in Yukon, Oklahoma, with terms and provisions that Plaintiffs will be covered for all damages sustained through

EXHIBIT

1-1

natural disasters such as flooding in accordance with the terms of the policy; and the affirmation that the policy is a legal contract between the Plaintiffs and the Defendants.

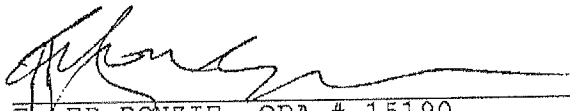
5. Defendant Higgins, and its employer, Farmers Insurance Company negligently failed and wrongfully and unreasonably provide flood insurance coverage for the home of the Plaintiffs.

6. As a result of Defendants' negligence, Plaintiffs have suffered tremendous economic loss and damages, severe mental and emotional anguish and distress, all compensable by law in excess of \$75,000.00.

7. Defendants' conduct was wanton, outrageous and reckless and evinced gross negligence such that it warrants punitive damages.

WHEREFORE premises considered, Plaintiffs demand judgment and compensation against the Defendants for actual damages in an amount in excess of \$75,000.00, and additional punitive damages in an amount in excess of \$75,000.00 and reasonably calculated to punish the Defendants for their conduct and to show others similarly situated to refrain from such practices.

Respectfully Submitted,

  
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ATTORNEY FOR PLAINTIFFS

ATTORNEYS' LIEN CLAIMED